

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
TACOMA DIVISION**

WILL CO. LTD. a limited liability company  
organized under the laws of Japan,

Plaintiff,

vs.

DOES 1-20, d/b/a AVGLE.COM,

Defendants.

**Case No.: 3:20-cv-05666-RSL**

**DECLARATION OF SPENCER  
FREEMAN IN SUPPORT OF  
PLAINTIFF'S *EX PARTE* MOTION  
FOR EARLY DISCOVERY**

NOTE ON MOTION CALENDAR:  
July 17, 2020

I, Spencer Freeman, under penalty of perjury, declare and state as follows:

1. I am an attorney at law licensed to practice before the Courts of the State of Washington, the United States District Court Western District of Washington, Eastern District of Washington, Ninth Circuit Court of Appeals, and United States Supreme Court. I am the principle attorney with the Freeman Law Firm, Inc., attorneys for Plaintiff Will Co. Ltd. Unless otherwise stated, I have personal knowledge of the facts contained herein this declaration and, if called and sworn as a witness, could and would competently testify thereto.

2. I sent emails to the following vendors associated with Mile High Glass Pipes, Inc. and Tucows Domains, Inc. I inquired whether they would honor my request for information without a subpoena. There has been no response from either.

DECLARATION OF SPENCER FREEMAN IN  
SUPPORT OF PLAINTIFF'S *EX PARTE* MOTION FOR  
EARLY DISCOVERY  
[3:20-cv-05666-RSL]

**FREEMAN LAW FIRM, INC.**  
1107 ½ Tacoma Avenue South  
Tacoma, WA 98042  
(253) 383-4500 - (253) 383-4501 (fax)

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Execute on the 17<sup>th</sup> day of July, 2020 at Tacoma, Washington.

/s/ Spencer D. Freeman  
Spencer Freeman